

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

HOKKY TJAHHJONO and MILES BLACK,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

WESTINGHOUSE AIR BRAKE
TECHNOLOGIES CORPORATION, d/b/a
WABTEC CORPORATION,

Defendant.

Case No. 2:23-cv-531-WSS

**PLAINTIFFS' UNOPPOSED MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

TO: THE COURT, ALL PARTIES, AND THEIR RESPECTIVE COUNSEL OF RECORD:

PLEASE TAKE NOTICE that Plaintiffs, Hokky Tjahjono and Miles Black (collectively, "Plaintiffs"), will, and hereby do, move the Court, on January 21, 2025 at 10:30 a.m., before the Honorable William S. Stickman IV, United States District Judge for the Western District of Pennsylvania, at the United States Courthouse, Courtroom 8B, 700 Grant Street, Pittsburgh, PA 15219, for an Order under Federal Rule of Civil Procedure 23:

(1) finally certifying, for purposes of the Settlement only, the following Settlement Class:

All Persons residing within the United States whose Personal Information was potentially compromised in the Cyberattack, beginning on or around March 15, 2022, during which unauthorized actors introduced malware onto the systems of Westinghouse Air Brake Technologies Corp. d/b/a Wabtec Corp.

(2) confirming that the notice plan approved by the Court in its August 26, 2024 Preliminary Approval Order has been fully and sufficiently executed;

(3) finally appointing Named Plaintiffs Hokky Tjahjono and Miles Black as Settlement Class Representatives;

(4) finally appointing Jamisen A. Etzel of Lynch Carpenter, LLP and Marc E. Dann of DannLaw as Settlement Class Counsel to act on behalf of the Settlement Class and the Settlement Class Representatives with respect to the Settlement;

(5) entering the proposed final judgment; and

(6) granting such other and further relief as may be just and appropriate.

This Motion is brought pursuant to Fed. R. Civ. P. 23(b)(3), and 23(e), is supported by Plaintiffs' accompanying Memorandum of Law, the joint declaration of Jamisen A. Etzel and Marc E. Dann; and the declaration of Gio Santiago of Verita Global, and all exhibits thereto.

Dated: January 10, 2025

Respectfully Submitted,

/s/ Jamisen A. Etzel

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Proposed Class Counsel for the Plaintiffs and Putative Class

CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2025, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using CM/ECF. Copies of the foregoing document will be served upon interested counsel via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Jamisen A. Etzel
Jamisen A. Etzel